

John Napolitano
Morris County Counsel
DECOTIS, FITZPATRICK, COLE & GIBLIN, LLP
Special Morris County Counsel
R. Scott Fahrney, Esq. Bar Id.: 017182008
90 East Halsey Road, Suite 385
Parsippany, New Jersey 07054
973-585-6254

Attorneys for Defendants, The County of Morris, Morris
County Sheriff's Office, and Bureau of Corrections

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CIVIL ACTION**

WC6 DOE,

Plaintiff

vs.

THE COUNTY OF MORRIS; MORRIS
COUNTY SHERIFF'S OFFICE, BUREAU OF
CORRECTIONS; EDWARD ROCHFORD,
individually and in his official capacity as Sheriff
of the Morris County Sheriff's Office; FRANK
CORRENTE, individually and in his official
capacity as Undersheriff of the Morris County
Sheriff's Office; and JOHN DOES #1-10
Defendants.

No.: 2:21-cv-20607-JMV-JSA

**NOTICE OF MOTION TO DISMISS
PURSUANT TO Fed. R. Civ. P. 12(b)(6)
FOR FAILURE TO STATE A CLAIM UPON
WHICH RELIEF CAN BE GRANTED**

**TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY:**

Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

ON NOTICE TO:

David M. Cedar, Esq.
Gerald Williams, Esq.
Shauna L. Friedman, Esq.
WILLIAMS CEDAR, LLC
8 Kings Highway West, Suite B
Haddonfield, New Jersey 08033
Attorneys for Plaintiff

John M. Barbarula, Esq.
Barbarula Law Offices
23 Professional Building
1242 Route 23 North
Butler, NJ 07405
Attorneys for Edward Rochford

William G. Johnson, Esq.
Johnson & Johnson
89 Headquarters Plaza
Suite 1425
Morristown, NJ 07960
Attorneys for Frank Corrente

PLEASE TAKE NOTICE that on March 7, 2022, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, attorney for Defendants, The County of Morris, Morris County Sheriff's Office, and Bureau of Corrections, shall apply by way of Motion before the United States District Court for the District of New Jersey for an Order dismissing Plaintiff's Complaint with prejudice against Defendants, The County of Morris, Morris County Sheriff's Office, and Bureau of Corrections.


PLEASE TAKE FURTHER NOTICE that Defendant will rely upon the Brief and of R. Scott Fahrney, Esq., submitted in support of this Motion.

PLEASE TAKE FURTHER NOTICE that Defendant requests oral argument if timely opposition to this Motion is filed.

A proposed form of Order is annexed hereto.

John Napolitano
Morris County Counsel

By: _____


R. Scott Fahrney, Esq.,
DeCotiis, FitzPatrick, Cole & Giblin, LLP
Special Morris County Counsel
Attorneys for Defendants County of Morris;
Morris County Sheriff's Office, Bureau of Corrections